

From: dennisf@uchicago.edu
Sent: Friday, May 05, 2006 3:01 AM
To: NOP Livestock
Subject: Docket # TM-06-06-PR, NOP Revisions to Livestock Standards

Docket TM-06-06-PR Mark Bradley, NOP
National Organic Program
1400 Independence Ave SW, Room 4008--SO, Ag Stop 0268 Washington, DC 20250

Dear Docket TM-06-06-PR Mark Bradley, NOP,

Mark Bradley, Associate Deputy Administrator Transportation and Marketing Program National Organic Program 1400 Independence Ave., SW, Room 4008--SO, Ag Stop 0268 Washington, DC 20250 Fax
(202) 205-7808 NOP.Livestock@usda.gov Docket TM-06-06-PR

As a consumer and supporter of organic agriculture, I am writing to comment on Docket #TM-06-06-PR, NOP - Revisions to Livestock Standards.

The organic label is one of the very few, and definitely one of the most important labels for consumers purchasing their food.

Organic is in truth the standard against which all other standards are measured. The integrity of the organic label has come into serious doubt with the recent passage of the named amendment. Having recently worked on an organic farm (outside of Berlin, Germany. I'm currently studying abroad), I appreciate first hand the importance of standards and regulations and the connection that consumers can make with the farm.

The proposed amendments to NOP rules will without a doubt deal a blow to consumers who place their trust in a governmental set of regulations which stand for standards of food production which are environmentally sustainable and avoid toxins which are used in the ill-named "traditional" form of agriculture (as organic farming is, in fact, traditional).

Unless clarified the new regulations could permanently allow numerous new synthetic processing aids, including over 500 food contact substances, to be used in organic foods without any type of public review for their safety and compatibility with organic production and could allow young dairy cows to be treated with antibiotics and then be converted to organic after twelve months.

Please act in the best interest of the entire organic community by taking action on the following:

1. Clarify the origin of livestock transitioning to organic dairy production.

Once an operation has been certified for organic dairy production, all dairy animals, including all replacement animals, should be under organic management from the last third of gestation. If this correction is not made, some operators and certifying agents may interpret the rule as allowing for the continuous conversion of conventionally raised dairy cows to organic production. Without closing this loophole, animals converted this way could be raised with the use of genetically engineered feed, antibiotics and hormones for their first year or so of life - all of which go against the spirit of organic dairy production and consumer expectation.

2. Close the loophole allowing the use of synthetic substances.

USDA's regulation does not address the large loophole allowing some synthetic substances, including "food contact substances"

and other processing aids, to be used in organic processing without formal review. The NOSB should review ALL synthetic substances used in organic processing, and all such substances should be added to the National List.

I believe our organic standards should be as strong as possible to ensure that consumers get what they expect from organic products. I urge the USDA to create new regulations that strictly apply the recent amendment to the OFPA.

Thank you for taking my comments into consideration,

Sincerely,

Dennis Fiser
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Cincinnati, Ohio 45220-1110